

Winona State University



Number: 2-8a

Responsible Officer: Chief Academic Officer
Responsible Office: Academic Affairs

Procedure for Grants and Sponsored Projects

PURPOSE: To establish guidelines, procedures, and responsibilities for submission and administration of grants and sponsored project or programs at Winona State University (WSU).

DEFINITIONS:

- a) Authorizing Official – designated positions with the authority to enter grant agreements and commit university resources toward an externally funded project
- b) Cooperative agreement – financial assistance mechanism similar to a grant, awarded by the funding agency to assist and support research and related activities
- c) Facilities and Administrative Costs (F&A) – costs that are incurred for common or joint objectives and therefore not easily attributable to a single project or activity, such as utilities, building maintenance, human resources, technology, etc.; also known as “indirect” or “overhead” costs
- d) Federally negotiated indirect cost rate – agreement negotiated between the cognizant federal agency and a grantee organization; the agreement publishes the reimbursement rate for indirect costs and fringe benefits incurred by the organization in the conduct of federal programs
- e) Fringe benefits – actual personnel expenses associated with any salary paid by the university
- f) Institutional base salary – an employee’s regular, annual compensation including salary, wages, and fringe benefits
- g) Modified Total Direct Costs (MTDC) – federally designated base to which finance and administrative (indirect) costs are applied. Includes salaries, wages, and fringe benefits; materials and supplies; services; travel; publication costs; and the first \$25,000 of each sub-award to other organizations
- h) Principal Investigator (PI) – individual designated to be responsible for ensuring compliance with all programmatic, fiscal, and administrative requirements of a grant or sponsored project

RESPONSIBILITIES:

The University

WSU is the legal and fiscal entity for all obligations related to grants and sponsored project contracts and activities. Therefore, funds are awarded to the university and shall be administered in accordance with Minnesota State and WSU policies. Only authorized officials (president, vice president, delegated authorities) shall enter grant agreements and commit university resources toward an externally funded project, either public or private.

Grants & Sponsored Projects Office

The Grants and Sponsored Projects Office is responsible for providing services for securing external support; assisting in identifying, preparing, and obtaining research, educational, and service grants and funding opportunities; ensuring that proposals adhere to WSU and funder requirements; maintaining grant files; and reporting external funding to Minnesota State and other entities as required.

Finance & Administration

Finance & Administration is primarily responsible for ensuring the grant budget complies with university policies, maintaining accounting records for each grant, preparing fiscal reports that meet the guidelines of the granting agency, and working with Grants & Sponsored Projects on indirect cost rates and regulations.

Principal Investigator

The PI (or Project Director) has primary responsibility for preparing the project proposal; obtaining approval for submission from the department chair, dean, and Director of Grants & Sponsored Projects; securing required facilities, equipment, and supplies; advising Grants & Sponsored Projects of notification of grant award or denial; preparing and administering an internal budget in consultation with the Accounting Director; working with Finance & Administration in preparing required fiscal reports; working with Grants & Sponsored Projects in the preparation of required reports.

INTERNAL PROCEDURES:

All new and continuation external funding proposals submitted by the university must go through an internal process via Grants & Sponsored Projects and with the approval of WSU's authorizing officials:

- a) After consulting with the appropriate department chair, dean, and Director of Grants & Sponsored Projects, the PI will complete the proposal.
- b) The PI will complete the grant Transmittal Form, securing approvals of the appropriate department chair and dean to commit resources (monetary, facilities, equipment, reassignment time, etc.) in support of the project.
- c) At least seven business days prior to the submission date, the proposal and Transmittal Form will be forwarded to the Director of Grants & Sponsored Projects for review for consistency with policies and regulations of Minnesota State, WSU, the sponsoring organization, and human subjects, animal subjects, biosafety, chemical safety, and recombinant DNA requirements.
- d) If approved, the proposal and Transmittal Form will be forwarded to the appropriate authorizing official.
- e) The authorizing official reviews the proposal in terms of institutional objectives, legal implications, bargaining agreements, commitments of facilities, personnel, and budgets, and post-grant assurances.

- f) The PI is notified of approval or disapproval of the proposal; with final approval, the grant proposal may be submitted according to the guidelines of the sponsoring organization
- g) The Transmittal Form and approvals may be based on a draft proposal and budget based on best estimates or ranges; however, if the budget varies by more than five percent (5%) or project activities substantially change, re-approvals will be required
- h) The PI will provide the notification document – whether an approval or denial – immediately upon receipt to the Director of Grants & Sponsored Projects
- i) If the grant is awarded, the Director will deliver any required letter of acceptance or agreement, contract, or other such document to the appropriate authorized official for approval
- j) If awarded, the Director will inform those who have committed resources in support of the grant (PI, chair, dean, and other individuals) and Finance & Administration, and fulfill any Minnesota State reporting requirements
- k) While several offices may be involved in management of the grant activities and funds, Finance & Administration is responsible for approving all expenditures from the grant account

GUIDELINES:

Budget Revisions

Sometimes it is necessary to revise the budget approved by the granting organization. Most funders have processes to make budget revisions. All budget revisions must be approved by the granting organization and the approval notification and revised budget forwarded to Grants & Sponsored Projects. The Director will notify Facilities & Administration of the approved revised budget.

Cost Sharing (Matching Funds)

Grant proposals that require a commitment of cost sharing or matching funds – either cash or in-kind – must have the prior approval of an authorized official (president or vice president). Cost sharing must be noted on the Transmittal Form and approved by the respective chair or director and dean. When the PI's unit or area cannot provide the total cost share required for the project, the PI should contact the Director of Grants & Sponsored Project at least 14 days in advance of the application deadline for assistance in determining possible cost sharing areas.

Facilities and Administrative (Indirect) Costs

Facilities and Administrative Costs shall be included on all proposals as follows:

- a) WSU's current federally negotiated rate shall be used on submissions to federal agencies when permitted by the funding agency, and on submissions to other organizations when the federally negotiated rate is permitted
- b) On non-federal grants, the rate of 10 percent of Modified Total Direct Costs (MTDC) shall be used when permitted by the funding organization
- c) When the sponsoring organization does not permit indirect costs or allows less than the university's designated rate, the PI must provide documentation that clearly states the policy as justification for requesting a non-standard rate

- d) Only the authorizing official, in consultation with the Director of Grants & Sponsored Projects, may waive the WSU indirect rate

Facilities and Administrative (Indirect) Costs Distribution

Indirect costs received through grant awards will be distributed as follows:

- 15% Department of PI
- 10% College of PI
- 15% Krueger Library
- 25% Finance & Administration
- 35% Grants & Sponsored Projects

Human and Animal Subjects

The PI is responsible for meeting all requirements of the Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) during the proposal process and conduct of all grant activities.

Public Health Service (including NIH) Submissions

Federal regulations require PIs submitting PHS (including NIH) grants to review the WSU Financial Conflict of Interest Module and the NIH FCOI Tutorial, and to forward the NIH certificate of completion to the Grants & Sponsored Projects Office. In addition, PIs must include a Disclosure Statement with the Transmittal Form even if no potential financial conflict of interest exists.

National Science Foundation (NSF) Submissions

When applying for NSF grants, federal regulations require PIs to file a Disclosure Statement with the Transmittal Form even if no potential financial conflict of interest exists. If the proposal is funded, undergraduate, graduate, and postdoctoral researchers must complete the Responsible Conduct in Research training module.

Multiple Submissions

When competing grant applications are proposed for an organization which discourages multiple or limits the number of submissions, the Director will notify the Deans' Council. The Deans' Council will recommend to the President

Reporting Requirements

- a) Grants & Sponsored Projects will maintain all records of grants, contracts, and cooperative agreement activity for the purposes of other reporting
- b) Finance & Administration will prepare and submit all official financial reports to funding agencies, and maintain all reports for audit purposes
- c) The PI will submit all programmatic reporting in a timely fashion, and notify Grants & Sponsored Projects of any deviation from the approved grant proposal

Salaries and Wages Charged to Grants

All policies and procedures must comply with Minnesota State, WSU, and the current federal *Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

- a) If allowed by the funding organization, employees may request that the agency “buy out” a portion of the employee’s responsibilities. Salaries, wages, and fringes charged to the grant will be based on the employee’s institutional base salary.
- b) For periods outside the academic year, compensation may not exceed the employee’s institutional base salary, per Uniform Guidance, Part 200
- c) For faculty reassignment time from 0.1 to 6.0 credit hours per academic year, salary, wage, and fringe replacement will be calculated at the current adjunct faculty rate for compensation and fringe benefits. For proposals exceeding 6.0 credit hours of reassignment, the replacement rate over the 6-hour maximum will be negotiated with the respective dean.

RELATED DOCUMENTS:

[Transmittal Form for Proposals to External Funding Sources](#)

[Transmittal Form Guidelines](#)

[Department of Health and Human Services – Colleges and Universities Rate Agreement](#)
[Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

[WSU Financial Conflict of Interest Module](#)

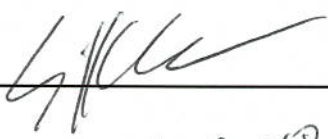
[NIH Financial Conflict of Interest Tutorial](#)

[Responsible Conduct in Research](#)

WSU Grant Task Force – Base Agreement to Support Grant Workload Reassignment

SIGNATURE, TITLE AND DATE OF APPROVAL:

This policy needs to be signed by the approval officer (listed below) before it is considered approved.

Approved: _____
President 

Date: _____ 11-8-18

Policy History:

Date of Adoption:

Date of Implementation:

Date & Subject of Revisions: